Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Digital Audio Broadcasting Systems	)	MM Docket No. 99-325
And Their Impact On the Terrestrial Radio Broadcast Service	)	

To: The Commission

COMMENTS OF NATIONAL PUBLIC RADIO, INC.

National Public Radio, Inc. ("NPR") hereby submits its Comments in response to the Commission's Public Notice regarding the National Radio Systems Committee's "In-Band/On-Channel Digital Radio Broadcasting Standard NRSC-5".[1] In its Public Notice, the Commission seeks comment on the initial digital audio broadcasting ("DAB") technical standard produced by the National Radio Systems Committee.

NPR is a non-profit membership corporation which produces and distributes noncommercial educational programming through 791 public radio stations nationwide. In addition to broadcasting award-winning NPR programming, including *All Things Considered®, Morning Edition®, Talk of*

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[1] Public Notice, Comment Sought on National Radio Systems Committee's DAB Subcommittee's "In-Band/On-Channel Digital Radio Broadcasting Standard NRSC-5", MM Docket No. 99-325, rel. June 16, 2005 [hereinafter "Public Notice"].

the Nation®, and Performance Today®, NPR's Member stations originate significant amounts of news, informational and cultural programming. NPR also operates the Public Radio Satellite Interconnection System and provides representation and other services to its Member stations.

NPR Supports Adoption Of The In-Band/On-Channel Digital Radio Broadcasting Standard NRSC-5

As a leading proponent of terrestrial digital radio, NPR supports adoption of the proposed NRSC-5 voluntary technical standard as a means of advancing DAB technology and encouraging its widespread deployment. Given the years of system development work required to solve the extraordinary technical challenges associated with building a spectrum efficient, analog compatible service, radio broadcasting has only recently begun the transition to digital broadcasting. During the preceding two and a half years of interim IBOC operations, moreover, radio broadcasting has witnessed tremendous growth in new wireless and non-broadcast audio services. We are hopeful that adoption of NRSC-5, following extensive industry collaborative efforts to further the development and implementation of digital radio in the United States, will further solidify the groundwork laid by the FCC in its adoption of IBOC technology as the appropriate technology for the U.S. marketplace.

NPR participated throughout the process and believes that public service interests have been well-served both by the process and the results of the NRSC standards setting activity. In late 2001, NPR expressed concern

about the conclusiveness of test data regarding the interference potential to radio reading services operating on FM SCA subcarriers.[2] In response, the NRSC and iBiquity Digital readily agreed to participate and fund additional tests to satisfy the concerns expressed.[3] This open and inclusive process admirably served the interests of affected parties, bolstering the credibility and quality of the overall standards setting activity.

NPR is also pleased that Supplemental Program Services (variously known as multicasting, Tomorrow Radio, and Supplemental Audio Channels) have been provided for in the standard. Terrestrial radio is the most ubiquitous, most accessed content delivery medium in the United States, and we believe the multicasting functionality of digital technology, in particular, will reinvigorate the service capabilities of the radio broadcasting medium. Accommodating multicasting within NRSC-5 is essential to adoption of the standard and the success of digital radio.

We specifically urge the Commission to embrace the reference spectral masks as appropriate service delimiters in adopting service rules for digital radio broadcasting. At the same time, the Commission should avoid setting minimum bit rate allocations for main or supplemental audio services. Those matters are properly left to local licensees, which are the best arbiters of the

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[2] See Comments of National Public Radio, Inc., MM Docket No. 99-325, at 4, filed Feb. 19, 2002).

[3] See Further Report on Analog SCA Compatibility with iBiquity's Digital FM-IBOC System, MM Docket No. 99-325, submitted May 24, 2002.

service and audio quality needs of their listeners, and continuous improvements in audio codec processors will translate directly into improved radio service.

With the adoption of NRSC-5, a significant technical milestone has been passed. To hasten the delivery of new public services to the American people, NPR urges the Commission to approve the standard without delay.

Conclusion

For the foregoing reasons, NPR supports the adoption of the In-Band/On-Channel Digital Radio Broadcasting Standard NRSC-5.

Respectfully submitted,

NATIONAL PUBLIC RADIO, INC.

Gregory A. Lewis /s/

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